REMARKS

This Response addresses the issues raised by the Examiner in the Office Action mailed March 30, 2004. Initially, Applicants would like to thank the Examiner for the careful consideration given this case. In view of the following remarks, Applicants feel that all outstanding issues have been addressed and prompt allowance of all remaining claims is respectfully requested.

Claim Objections

Claim 20 has been amended to cure the typographical error noted by the Examiner. This amendment is not made for reasons of patentability.

Claim Rejections

The Examiner rejected Claims 1-20 under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,812,750 to Dev et al. ("Dev"). Respectfully, Applicants disagree with the Examiner's arguments related to Dev and with the Examiner's characterization of the present claims. These issues are discussed below, in turn.

Using Claim 1 as an example, the present invention is a system for visualizing a multi-layer topolgy schematic comprising a visualization control means, wherein in response to an input by which a partial domain and a requested view level to which the currently displayed schematic is to change have been selected, the visualization control means sets the requested view level in the partial domain management unit associated with the selected partial domain. The system then displays, within the selected partial domain, the component belonging to the requested view level as defined in the associated partial domain management unit. See, Claim 1.

Likewise, Claim 13 is a method for visualization in which, after an initial topology schematic on an initial view level is shown on a terminal screen, in response to user input by which a partial domain and a requested view level to which the currently displayed schematic is to change have been selected, the system determines which components belong to the requested view level from the partial domain view level table for the selected partial domain and changes to the display of the partial domain to that of the determined components. See Claim 13.

These two exemplary claims show that by using the present invention, it is possible to

change the view layer for the view components without being restricted by a hierarchical relationship (see lines 1-16 of paragraph [133]).

Claim 19 adds functionality making it possible to change the view layer with connection lines between specified network components, and to easily recognize the correspondence between new and old components before and after a view layer change. See Claim 19 and lines 1-16 of paragraph [133].

In the Office Action, the Examiner argued that Dev teaches that "a user may drill-down within a selected partial domain (i.e., model) to view a next level of detail view by clicking on a location of a display." In actuality, Dev merely allows for the change of view level to be employed hierarchically using topological schematics with parent-child relationships. This is the very conventional visualization methodology that the present invention overcomes, and this does not address the claims as described above.

Specifically, as described above, the present invention (Claim 1) comprises a system that displays, within said selected partial domain, the component belonging to said requested view level as defined in the associated partial domain management unit. The Dev system, as with all other conventional systems, changes the view of all parts of the display (see FIGS. 7-8 in Dev), and does not allow view change in only a partial domain on the display as claimed and described according to the present invention (see FIGS. 4, 5, 6, 9 and 26 of the present invention).

Likewise, additional aspects of this non-hierarchical relationship are included in Claim 13 (changing the display of a selected partial domain) and Claim 19 (generating a connection table in which component-to-component connections are defined from topology definition data). Again, the conventional hierarchical nature of the Dev component relationships do not teach or suggest these features of the present invention. Through the present invention, it is possible to change the view layer with connection lines between the various network components in a way which facilitates the recognition of any correspondence between old and new displayed components after view layer (and partial layer) changes. See lines 1-16 of paragraph [133].

All of the other claims properly depend form one of the claims discussed above and are therefore allowable for at least the reasons described with respect to the base claim.

The above remarks address each and every concern raised by the Examiner in the Office Action. Applicants believe that all remaining claims of the present invention are now

in condition for final allowance. If the Examiner feels that any issues remain outstanding, the Examiner is encouraged to contact Applicant's attorney at the contact information below.

Respectfully submitted,

Stanley P. Fisher

Registration Number 24,344

Juan Carlos A. Marquez Registration No. 34,072

Robert D. Kucler

Registration No. 45,908

REED SMITH LLP 3110 Fairview Park Drive Suite 1400 Falls Church, Virginia 22042 (703) 641-4200 June 30, 2004